

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KEISHA L. WILLIAMS,

Defendant.

Criminal No. 1:18-CR-160

Hon. Leonie M. Brinkema

Trial Date: October 15, 2018

GOVERNMENT'S SUBMISSION OF JOINT PROPOSED SPECIAL VERDICT FORM

Pursuant to the Court's Order dated October 11, 2018, the parties have conferred and agreed to the Proposed Special Verdict Form, which the government is submitting on behalf of the parties.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

By: \_\_\_\_\_/s/

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Jack Hanly  
Assistant United States Attorneys  
United States Attorney's Office  
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VERDICT FORM—COUNT ONE

With respect to Count One, wire fraud (August 11, 2015, check deposit):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT THREE

With respect to Count Three, wire fraud (July 14, 2016, phone call):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT FOUR

With respect to Count Four, wire fraud (July 15, 2016, email):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT FIVE

With respect to Count Five, wire fraud July 27, 2016, phone call):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT SIX

With respect to Count Six, wire fraud (October 16, 2017, text message):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT SEVEN

With respect to Count Seven, wire fraud (December 9, 2016, phone call):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT EIGHT

With respect to Count Eight, wire fraud (November 1, 2017, text message):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson



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VERDICT FORM—COUNT NINE

With respect to Count Nine, wire fraud (January 1, 2018, phone call):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT TEN

With respect to Count Ten, financial transaction in illegal proceeds (March 25, 2015,  
Citibank, \$14,612.70):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
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VERDICT FORM—COUNT ELEVEN

With respect to Count Eleven, financial transaction in illegal proceeds (February 12, 2016, Bank of America, \$40,000):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
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VERDICT FORM—COUNT TWELVE

With respect to Count Twelve, financial transaction in illegal proceeds (April 20, 2017,  
Citibank, \$124,000):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT THIRTEEN

With respect to Count Thirteen, financial transaction in illegal proceeds (October 27, 2017, Citibank, \$16,000):

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
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VERDICT FORM—COUNT FOURTEEN

With respect to Count Fourteen, conspiracy to impersonate a federal agent to demand money:

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

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VERDICT FORM—COUNT FIFTEEN

With respect to Count Fifteen, obtaining confidential phone records:

We, the jury, find the Defendant, KEISHA L. WILLIAMS:

Not Guilty: \_\_\_\_\_ Guilty: \_\_\_\_\_

If you find the defendant guilty of having unlawfully purchased or obtained confidential telephone records, then you must determine whether she did so either:

\_\_\_\_\_ while violating another law of the United States, in this case either wire fraud or conspiracy to impersonate a federal agent to demand money; or

\_\_\_\_\_ as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Foreperson

## CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2018, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of that electronic filing (NEF) of the foregoing to the following:

Robert Lee Jenkins , Jr.  
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Acting United States Attorney

By: /s/  
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